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19
20 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**

21 CHASOM BROWN, WILLIAM BYATT,
22 JEREMY DAVIS, CHRISTOPHER
22 CASTILLO, and MONIQUE TRUJILLO
23 individually and on behalf of all similarly
23 situated,

24 Plaintiffs,

25 vs.

26 GOOGLE LLC,

28 Defendant.

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Case No.: 5:20-cv-03664-LHK-SVK

**DECLARATION OF ALEXANDER P.
FRAWLEY IN SUPPORT OF
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF PLAINTIFFS'
OBJECTIONS TO SPECIAL MASTER'S
REPORT (DKT. 299)**

The Honorable Susan van Keulen
Date: November 4, 2021
Time: 10:00 a.m.
Courtroom 6 - 4th Floor

DECLARATION OF ALEXANDER P. FRAWLEY

I, Alexander P. Frawley, declare as follows.

3 1. I am an associate with the law firm of Susman Godfrey L.L.P., counsel for Plaintiffs in
4 this matter. I am an attorney at law duly licensed to practice before all courts of the State of New
5 York, and admitted *pro hac vice* in this case. (Dkt No. 97). I have personal knowledge of the
6 matters set forth herein and am competent to testify.

7 2. Pursuant to Civil Local Rule 79-5(e), I submit this Declaration in Support of Plaintiffs'
8 Administrative Motion to Seal Portions of Plaintiffs' Objections to the Special Master's Report
9 and Orders on Referred Discovery Issues (Dkt. 299) ("Plaintiffs' Objections"). Plaintiffs'
10 Objections reference material that Google LLC ("Google") has designated as "Confidential" and
11 "Highly Confidential – Attorneys' Eyes Only" under the parties' Protective Order (Dkt No. 81).
12 Plaintiffs' [Proposed] Order Regarding Plaintiffs' Objections likewise references material that
13 Google has designated as "Confidential" and "Highly Confidential – Attorneys' Eyes Only." And
14 Exhibits A through E to Plaintiffs' Objections are documents that Google has designated as
15 "Confidential" and "Highly Confidential – Attorneys' Eyes Only."

16 3. Plaintiffs respectfully request that the Court seal the redacted portions of Plaintiffs'
17 Objections and Plaintiffs' [Proposed] Order, as well as Exhibits A through E to Plaintiffs'
18 Objections in their entirety. Copies of the foregoing papers are attached to Plaintiffs'
19 Administrative Motion to Seal.

20 4. Pursuant to Civil Local Rule 79-5(e)(1), Google, as the designating party, must file a
21 declaration within 4 days establishing that all of the designated material is sealable.

22 5. I personally served a copy of this Declaration on Google's counsel of record by email
23 on October 27, 2021. A Proof of Service is concurrently filed herewith.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 27th day of October, 2021, at New York, New York.

/s/ Alexander P. Frawley